

**UNITED STATES DISTRICT COURT
FOR THE
SOUTHERN DISTRICT OF NEW YORK**

| | | |
|---------------------------------------|---|--------------------------------|
| Frank Liu |) | |
| |) | |
| Plaintiff, |) | |
| |) | Case No. 1:22-cv-09084-JHR-OTW |
| v. |) | |
| |) | Judge Jennifer H. Rearden |
| The Nielsen Company (US) LLC, et al., |) | |
| |) | |
| Defendants. |) | |
| |) | |

DEFENDANTS’ PROPOSED AGENDA FOR MAY 14, 2025 STATUS CONFERENCE

Because the Parties have not been able to agree on a joint proposed agenda, Defendants TNC US Holdings and The Nielsen Company (US), LLC (“Defendants”) separately submit the below proposed agenda for the upcoming May 14, 2025 status conference.

1. Status of *Pro Bono* Counsel for Plaintiff and Discovery Procedure

Defendants believe discovery should be stayed until Plaintiff has secured *pro bono* counsel and such counsel has filed a notice of appearance in this case. Once the stay is lifted, discovery should begin in accordance with the Federal Rules of Civil Procedure.

2. Status of Settlement Discussions

Defendants are amenable to continuing settlement discussions with Plaintiff after he secures *pro bono* counsel.

Dated: Chicago, Illinois
May 7, 2025

Respectfully submitted,

By: /s/ Cardelle Spangler
Cardelle Spangler (admitted *pro hac vice*)

WINSTON & STRAWN LLP
35 W. Wacker Drive
Chicago, Illinois 60601
(312) 558-5600
CSpangler@winston.com

Attorney for Defendants
TNC US Holdings
The Nielsen Company (US), LLC